UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ROBERT S. KELLY,)
Plaintiff,)))
V.)
UNITED STATES OF AMERICA, BOP OFFICER TAWANA F. INGRAM, UNKNOWN JOHN AND JANE DOE BOP OFFICERS, and LATASHA KEBE (also known as "TASHA K"),) No. 23 C 15885) Judge Bucklo)
Defendants.)

JOINT STATUS REPORT

In accordance with the court's January 3, 2025, minute entry (Dkt. 43), the parties jointly submit this status report:

- 1. As of January 22, 2025, Defendant United States produced more than 13,000 pages of records as well as a written response to Plaintiff Robert S. Kelly's document requests.
- 2. Plaintiff has been in contact with Defendant United States regarding some deficiencies that plaintiff perceives in the United States' and intends to submit a formal letter regarding same in short course.
- 3. Now that Plaintiff has obtained discovery production from Defendant United States, Plaintiff is also assessing whether he needs to amend his complaint to identify specific BOP officers. As such, Plaintiff is seeking another extension of time until May 5, 2025, to amend his complaint, in the event an amendment is necessary. Defendant United States has no objection to Plaintiff's request.

- 4. Following review of the document production, as well as a visit with Plaintiff Kelly, Counsel for Plaintiff intends to respond to the United States' written discovery requests. Given Mr. Kelly's incarcerated status as well as Plaintiff and his counsels' limited access to documents, Plaintiff Kelly requires additional time to respond to the United States' written discovery requests.
- 5. Plaintiff and Defendant United States intend to propound discovery requests upon Defendant Tawana F. Ingram within the next month.
- 6. Plaintiff and Defendant United States have been working cooperatively to move this matter along. Should any discovery issues arise, the parties will work together to try to resolve them before seeking the court's involvement.
 - 7. The parties propose that they file another status report by May 2, 2025.

Respectfully submitted,

s/ ASHLEY COHEN
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